

YAMPOLSKY & MARGOLIS
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA)	Case No.	2:17-cr-306-JCM-VCF
)		
Plaintiff,)	STIPULATION TO RELEASE	
)	CERTAIN PROTECTED DISCOVERY	
vs.)	WITH NO PERSONALLY	
)	IDENTIFYING INFORMATION	
[15] EDGAR ROJAS,)		
)		
Defendants.)		
)		

IT IS HEREBY STIPULATED AND AGREED by and between David L. Jaffe, Chief United States Department of Justice Organized Crime and Gang Section, Kelly Pearson, Deputy Chief and Chad W McHenry and Alexander Gottfried, Trial Attorneys, and Mace Yampolsky, Esq., counsel for Defendant Edgar Rojas, that certain protected discovery with no Personally-Identifying Information “PII”, protected by the Stipulation for Temporary Protective Order [ECF 397], may be released to Defendant Edgar Rojas, specifically a Department of Homeland Security Report of Investigation dated 09/25/2018 at 17:23 EDT. (A copy of which will be filed as Exhibit “A” to this Stipulation Under Seal).

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1 IT IS FURTHER STIPULATED AND AGREED that if, in the future, the parties agree
2 that additional discovery containing no “PII”, is discovered, it may be sent to Defendant Rojas
3 without the necessity of an Order from this Court.

4 IT IS FURTHER STIPULATED AND AGREED that one of the reasons this Stipulation
5 is being entered into is because of the restrictions that the Federal Bureau of Prisons have
6 imposed due to Covid 19 bar counsel from meeting with Defendant in person to review these
7 materials with him.

8
9 DATED this 28th day of April, 2020.

10 YAMPOLSKY & MARGOLIS

DAVID L. JAFFE
Organized Crime and Gang Section

11 /s/ Mace J. Yampolsky, Esq.
12 MACE J. YAMPOLSKY, ESQ.
Attorney for Defendant

/s/ Chad McHenry
CHAD MCHENRY
Trial Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA)	Case No.	2:17-cr-306-JCM-VCF
)		
Plaintiff,)	ORDER TO RELEASE	
)	CERTAIN PROTECTED DISCOVERY	
vs.)	WITH NO PERSONALLY	
)	IDENTIFYING INFORMATION	
[15] EDGAR ROJAS,)		
)		
Defendants.)		
)		

Based on the foregoing; and good cause appearing;

THE COURT FINDS that one of the reasons this Stipulation is being entered into is because of the restrictions that the Federal Bureau of Prisons have imposed due to Covid 19 bar counsel from meeting with Defendant in person to review these materials with him, and therefore;

IT IS HEREBY ORDERED that that certain protected discovery with no Personally-Identifying Information "PII", protected by the Stipulation for Temporary Protective Order [ECF 397], may be released to Defendant Edgar Rojas, specifically the Department of Homeland Security Report of Investigation dated 09/25/2018 at 17:23 EDT.

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1 IT IS FURTHER ORDERED that if, in the future, the parties agree that additional
2 discovery containing no "PII", is discovered, it may be sent to Defendant Rojas without the
3 necessity of an Order from this Court.

4 DATED this 28th day of April, 2020.

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6 _____
UNITED STATES MAGISTRATE JUDGE